**FWP Region 6**
**1 Airport Rd**
**Glasgow, MT 59230**

**August 26, 2020**

# DECISION NOTICE

## Goldfish Treatment Near Zortman, MT

### DESCRIPTION OF PROPOSED PROJECT

Montana Fish, Wildlife and Parks (FWP) proposes to remove a self-sustaining goldfish population in an unnamed pond near Zortman, MT. The conservation and inherent value of native and non-native game fish in the Missouri River system and Fort Peck drainage is substantial. Currently, an unmanaged source population of goldfish, an aquatic invasive species, threatens the distribution and densities of downstream populations of several native prairie fish species. The threat of this goldfish population to continue to reproduce and distribute to downstream locations needs to be addressed to eliminate the risk of competition with native fish and expansion of this non-native invasive species in the Fort Peck drainage.

### MONTANA ENVIRONMENTAL POLICY ACT (MEPA) PUBLIC PROCESS AND COMMENT

The Montana Environmental Policy Act (MEPA) requires FWP to assess impacts to the human and natural environment. The draft EA was released on June 16, 2020 with a 31-day comment period ending July 17, 2020. Legal Notice of the EA release and comment period was published in the Havre Daily News and the Phillips County News. Public Notice was placed on the FWP Website and the information was shared via the FWP Region 6 Facebook page. Direct mailing and/or email notification was provided to adjacent landowners, Fort Belknap Indian Community, interested parties, Phillips County Commissioners, DNRC, BLM and NRCS. The Draft EA was available to interested parties by downloading from the FWP Website. Hard copies were available at the FWP Region 6 office in Havre.

### SUMMARY OF PUBLIC COMMENT

A total of four comments were received through the public comment period representing four individuals. All comments were received electronically. Three comments received expressed support for the removal of goldfish and one opposed.

**Comment #1:**
Name: Darwin Reynolds
City: Unknown

Charge the private pond owner for the treatment. If the owner was responsible for the goldfish introduction, a fine should be in order.

**Response:** Thank you for your comments. MFWP does not know the source of this illegal introduction.

**Comment #2:**
Name: Mike Getman
City: Lewistown

Cody,

I support your proposed action to eradicate goldfish from the Pond near Zortman. Illegal introductions are not acceptable and the long-term consequence if they travel elsewhere could be significant.

I also hope, that if the person is identified who introduced the goldfish, is held accountable for the expense of this eradication.

And thanks much for your annual advice when I travel to your area to fish!

Mike Getman
Lewistown, MT

**Response:** Thank you for your comments. MFWP does not know the source of this illegal introduction.

**Comment #3:**
Name: Matt DeWit
City: Belgrade

I finished 2/3 majors in related fields with honors. I couldn't agree with your proposal more. With a lifespan of .5-3.5 days in water this is a fantastic idea. It's a natural substance and doesn't really do anything to humans unless they drink from the pond within 4 days. Go you guys.

Also, people comparing it to fracking or the damages those much longer lasting chemicals do to water systems is very uninformed since a 1-minute Wikipedia skim would disprove their concerns.

Introduced fish could devastate Ft. Peck just like Lake Trout in Yellowstone or countless other examples.

**Response:** Thank you for your comments.

**Comment #4:**
Name: Bud Martin
City: Zortman

I live directly downstream from this pond. I am absolutely AGAINST any poison treatment in the water. My water well and pond could be affected. Leave the fish there, they have been there for years and the possibility of them "escaping" to any other water body is ZERO.

**Response:** Thank you for your comments. As described in the EA, rotenone is a naturally occurring substance derived from the roots of the tropical plants. Rotenone has been used by native peoples for centuries to capture fish for consumption in areas where these plants are found. It has been used in Fisheries management since the 1930's. Rotenone powder has been registered for use as a natural insecticide for gardening and to control parasites such as lice in domestic livestock. Currently, several liquid and powder formulations of rotenone are Environmental Protection Agency registered products for the removal of unwanted fish.

FWP has a long history of using rotenone to manage fish populations dating back to 1948. Generally, the goal of these projects is to remove unwanted (invasive species), improve angling or conserve native species. Rotenone is very specific in its action; it inhibits electron transfer at the cellular level and is effective at very low concentrations (< 1 part per million) with fish because it is readily absorbed into the bloodstream through the thin cell layer in the gill tissue. Mammals, birds, and other non-gill breathing organisms do not have this rapid absorption route into the bloodstream and thus can tolerate exposure to concentrations much higher than that used to kill fish.

Rotenone in the proposed project area would be applied using a small boat and a venturi pump attached to an electric trolling motor to disperse the chemical. Backpack sprayers will be used to apply chemical to shallow areas of the pond where distribution from the primary applicator will be minimal.

The pond will be pumped down prior to treatment to ensure that no surface flow is occurring during treatment. If surface flow does occur during treatment, Potassium permanganate would be applied to pond outflow to detoxify rotenone within a short distance (<0.5 miles) thereby preventing downstream impacts.

No contamination of groundwater is anticipated to result from this project. Rotenone binds readily to sediments and is broken down by soil and in water (Skaar 2001; Engstrom-Heg 1971, 1976; Ware 2002). Rotenone moves only one inch in moist soil types the only exception is sandy soils where movement is about three inches (Hisata 2002). In California, studies were wells were placed in aquafers adjacent to and downstream of rotenone application have never detected rotenone, rotenolone, or any of the other organic compounds in the formulated products (CDFG 1994). Case studies in Montana have concluded that rotenone movement through groundwater does not occur. For example, at Tetrault Lake, Montana neither rotenone nor inert ingredients were detected in a nearby domestic well, which was sampled two and four weeks after applying 90 ppb rotenone to the lake. This well was chosen because it was down gradient form the lake and also drew water form the same aquifer the fed and drained the lake. In 1998, a Kalispell area pond was treated with Prenfish 5% rotenone. Water from a well, located 65 feet from the pond, was analyzed and no sign of rotenone was detected. In 2001, another Kalispell-area pond was treated with Prenfish 5% rotenone. Water from a well located 200 feet from that pond was tested four times over a 21-day period and showed no sign of contamination. In 2005, MFWP treated a small pond near Thompson Falls with Prenfish 5% rotenone to remove pumpkinseeds and bass. A well located 30 yards from the pond was tested and neither Prenfish nor inert ingredients were found in the well.

Because ground water leaving the “unnamed pond” must travel through sediments, soil and gravel, and rotenone is known to bind readily with these substances, we do not anticipate any contamination of ground water.

For additional information, please see document titled “White Paper: Chemical and Mechanical Means of Fish Removal.” This document provides review and the use of rotenone.

**DECISION NOTICE**

Utilizing the EA and public comment, a decision must be rendered by FWP which addresses the concerns and issues identified in the proposed action.

FWP’s analysis supports the removal of goldfish in an unnamed pond near Zortman, MT using the piscicide rotenone.

I find there to be no significant impacts on the human and physical environments associated with this project. Therefore, I conclude that the Environmental Assessment is the appropriate level of analysis, and that an Environment Impact Statement is not required.

**After review of this proposal, it is my decision to accept the draft EA as supplemented by this Decision Notice as final, and to recommend proceeding with the proposed Goldfish Treatment near Zortman, MT, contingent upon approvals by the Fish and Wildlife Commission.**

The Final EA may be viewed on FWP’s website: http://www.fwp.mt.gov or be obtained upon request from Montana Fish, Wildlife and Parks, Region 6 Headquarters, 1 Airport Rd., Glasgow, MT 59230 or (406) 228-3700.

Mark Sullivan

Mark Sullivan — Date: August 26th, 2020

FWP Regional Supervisor, Region 6